

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

Timothy J. Donohue,)
)
Plaintiff,) Case No. 4:22-CV-04044-KES
)
vs.) **DEFENDANTS' MOTION FOR**
) **PARTIAL SUMMARY**
Arthur J. Gallagher & Co., a Delaware) **JUDGMENT**
Corporation; and Bob Jacobsen)
)
Defendants.)
)

Defendants, by their counsel of record, respectfully move the Court for an Order granting them summary judgment on Plaintiff's First Cause of Action in the Complaint. In support of this Motion, Defendants refer the Court to all files and proceedings herein, including Defendants' Statement of Undisputed Material Facts, the Declaration of Bob Jacobsen, and Defendants' Memorandum of Law in Support of Motion for Partial Summary Judgment, all filed herewith.

Pursuant to L.R. 7.1C, Defendants request oral argument.

Dated: July 28, 2022

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P. C.

/s/ Hal A. Shillingstad

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